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## UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS

PIERRE BRAZEAU, Individually and on Behalf of All Others Similarly Situated,

Plaintiffs,

VS.

CASSAVA SCIENCES, INC., REMI BARBIER, ERIC J. SCHOEN, JAMES W. KUPIEC, NADAV FRIEDMANN and MICHAEL MARSMAN,

Defendants.

Case No. 1:21-cy-00751-RP

WANDA NEWELL, Individually and On Behalf of All Others Similarly Situated,

Case No. 1:21-cv-00760-RP

Plaintiff,

VS.

CASSAVA SCIENCES, INC., REMI BARBIER, and ERIC J. SCHOEN,

Defendants.

KATLYN K. REIN, Individually and on Behalf of All Others Similarly Situated,

Plaintiffs,

VS.

CASSAVA SCIENCES, INC., REMI BARBIER, ERIC J. SCHOEN, JAMES W. KUPIEC, NADAV FRIEDMANN and MICHAEL MARSMAN,

Defendants.

Case No. 1:21-cv-00856

## DECLARATION OF WARREN T. BURNS IN SUPPORT OF MOTION OF THE CASSAVA SECURITIES GROUP FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF, AND APPROVAL OF SELECTION OF LEAD COUNSEL

- I, Warren T. Burns, Esq. declare as follows:
- 1. I am a member in good standing of the bar of the State of Texas and am admitted to practice before this Court. I submit this declaration in support of the motion filed by Proposed Lead Plaintiff, Warren Choi, Kevin Otto, and Ken Van Ho, investors in Cassava securities including common stock and options, (collectively the "Cassava Securities Group" or "Movant") for the entry of an Order of the following: (i) consolidating the related actions; (ii) appointing

Movant as Lead Plaintiff; (iii) approving Movant's selection of Berger Montague PC as Lead Counsel and Burns Charest LLP as Local Counsel for the Class; and (iv) granting such other and further relief as the Court may deem just and proper.

- 2. Attached as Exhibits A through D are true and correct copies of the following documents:
- EXHIBIT A: Signed Certifications of Movants pursuant to the requirements of the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 78u-4(a)(2);
- EXHIBIT B: Notice of pendency of class action lawsuit against Cassava Sciences, Inc., published on August 28, 2021;
- EXHIBIT C: Chart reflecting calculation of financial losses sustained by Movant on Class Period transactions in Cassava Sciences, Inc. securities;
- EXHIBIT D: Joint Declaration in Support of Motion to Consolidate Related Cases, Appointment as Lead Plaintiff, and Approval of Lead Plaintiff's Selection of Lead Counsel.

I declare, under penalty of perjury, that the foregoing is true and correct to the best of my knowledge.

Executed this 26<sup>th</sup> day of October 2021. /s/ Warren T. Burns
Warren T. Burns

## **CERTIFICATE OF SERVICE**

I hereby certify that on October 26, 2021, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

<u>/s/ Warren T. Burns</u> Warren T. Burns